

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LEARNING ANNEX HOLDINGS, LLC,
LEARNING ANNEX, LLC, and
LEARNING ANNEX, L.P.,

Plaintiffs,

09-CV-4432 (SAS/GWG)

- against -

RICH GLOBAL, LLC and
CASHFLOW TECHNOLOGIES, INC.,

Defendants.
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PLAINTIFFS' OBJECTIONS TO DEFENDANTS' DEPOSITION DESIGNATIONS
AND COUNTER-DESIGNATION

Learning Annex v. Rich Dad, 09-cv-4432

Plaintiffs' Objections to Rich Dad Deposition Designations¹ and Counter-Designation

Defendant's Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation ²
Sharon Lechter (11/19/09)		
103:13-106:5	Relevance; form; hearsay	
121:13-25	Not admitted at first trial; misleading; confusing; prejudicial	121:5-121:12

¹ Defendant reserves the right to supplement its designations in the event that the Court allows into evidence facts that Defendant apparently intends to exclude in its future motion *in limine*.

² Plaintiffs reassert their objection to any designation that was not admitted at the first trial. This counter-designation is listed only in the event that the Court allows Defendants' designation.